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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 SILVIA AHN CASE NO: 1:22-00586-JLT-CDB

12 Plaintiff

CASE NO: 1:22-00586-JLT-CDB

13 v. **GEO GROUP, INC'S RESPONSE TO**
14 **PLAINTIFF'S MOTION FOR LEAVE TO FILE**
15 **SECOND AMENDED COMPLAINT**

16 GEO GROUP INC ET AL.

Defendants.

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20 THIS RESPONSE IS FILED by Defendant GEO Group, Inc. in response to the

²¹ Plaintiff Sylvia Ahn's Motion to File a proposed Second Amended Complaint, which requests:

(1) adding the United States as a defendant; and

23 (2) add six claims against defendants Immigration and Customs Enforcement (ICE).

24 and the United States under the Federal Tort Claims Act (FTCA).

25 GEO GROUP adopts and supports the Response as filed by ICE and therefore,
26 requests the Motion to denied. 3

27 Therefore, for the foregoing reasons, GEO GROUP reasserts its positions and

28 defense as set forth in its pending Motion to Dismiss and respectfully requests that this Court
29 deny the Plaintiff's request to file her Second Amended Complaint.

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Respectfully submitted,

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Dated: March 31, 2023

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CHERYL WILKE ESQ.

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By: *Cheryl Wilke*

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Attorney for Geo Group

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CERTIFICATE OF SERVICE

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I HEREBY CERTIFIY that on March 31, 2023, a true and correct copy of the foregoing has been served on all counsel of record via this Court's CM/ECF electronic filing system.

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/s/ *Cheryl Wilke*

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Attorney for Geo Group